

To: Chan, Janice[Chan.Janice@epa.gov]
From: Chen, Eugene
Sent: Fri 2/3/2017 11:22:30 PM
Subject: FW: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

From: Chen, Eugene
Sent: Friday, February 03, 2017 3:21 PM
To: Christenson, Kara <Christenson.Kara@epa.gov>; Meer, Daniel <Meer.Daniel@epa.gov>; McKaughan, Colleen <McKaughan.Colleen@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Rios, Gerardo <Rios.Gerardo@epa.gov>
Cc: Spiegelman, Nina <Spiegelman.Nina@epa.gov>
Subject: RE: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

Mr. Brittle has good timing. We had our regular permitting call with Maricopa AQD this morning. I'll provide a more extensive update and look to set up a meeting so that we can discuss, but here are the highlights:

- For the Tonopah facility (the one with the permit remand), it appears at present that Maricopa intends to determine that the emissions from the facility are fugitive in nature. They intend to rely on a rationale set forth in a US v Nucor court decision, a 1998 US District Court decision from Northern Alabama.
- Maricopa was willing to forward on a pre-draft version of their permit/determination, although we did not discuss just how early we would want to see it
- They intend to move forward with the permit by the end of February at earliest; more likely the first or second week of March
- They expect the next step to be an appeal of the permit to the AZ Superior Court

In addition, I had looked into collecting more information on the Hickman facility on Ak-Chin land. I do not have much more to offer, except that it does appear to be a smaller facility than Tonopah or Arlington (no chicken count, unfortunately), and that the Ak-Chin staff seemed to think it had been modified recently (i.e., in the last 2-3 years).

I'll start looking for time on people's calendar so we can plan next steps.

From: Christenson, Kara
Sent: Friday, February 03, 2017 1:02 PM
To: Meer, Daniel <Meer.Daniel@epa.gov>; McKaughan, Colleen <McKaughan.Colleen@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Rios, Gerardo <Rios.Gerardo@epa.gov>; Chen, Eugene <Chen.Eugene@epa.gov>
Cc: Spiegelman, Nina <Spiegelman.Nina@epa.gov>
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Adding Gerardo and Eugene.

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Kara Christenson

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christenson.kara@epa.gov

From: Meer, Daniel

Sent: Friday, February 03, 2017 1:01 PM

To: McKaughan, Colleen <McKaughan.Colleen@epa.gov>; Christenson, Kara <Christenson.Kara@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>

Cc: Spiegelman, Nina <Spiegelman.Nina@epa.gov>

Subject: RE: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

Colleen – is there any word on the status of that permit remand?

Dan

Daniel A. Meer, Assistant Director

Superfund Division

Emergency Response, Preparedness and Prevention Branch

415.972.3132 (O)

415.971.6792 (C)

From: McKaughan, Colleen

Sent: Thursday, February 02, 2017 6:45 PM

To: Christenson, Kara <Christenson.Kara@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>; Salazar, Matt <Salazar.Matt@epa.gov>; Meer, Daniel <Meer.Daniel@epa.gov>

Cc: Spiegelman, Nina <Spiegelman.Nina@epa.gov>

Subject: FW: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

Hi,

Looping you in.

Colleen

From: Strauss, Alexis

Sent: Thursday, February 02, 2017 5:48 PM

To: McKaughan, Colleen <McKaughan.Colleen@epa.gov>; Adams, Elizabeth <Adams.Elizabeth@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>

Subject: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

From: Don't Waste Arizona [<mailto:dwaz@fastq.com>]

Sent: Thursday, February 2, 2017 4:16 PM

To: Cabrera.misael@azdeq.gov; Randall G. Matas <Matas.Randall@azdeq.gov>

Cc: Strauss, Alexis <Strauss.Alexis@epa.gov>

Subject: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

Dear Mr. Cabrera and Mr. Matas:

Attached is the file I received today from ADEQ regarding its modeling of ammonia emissions (releases) from the Hickman's Arlington and Tonopah facilities. Even though I believe the emissions rates/bird are understated, and that ADEQ failed to use the proper software for modeling chemical releases (ALOHA), and also set the release height too low, among other issues, I used the data supplied to get the following result:

I did a simple grams to pounds conversion and found that even ADEQ's computation show exceedances of the 100 lb reportable quantity for ammonia every day. (EPCRA requires that the SERC and LEPC of jurisdiction must be notified immediately when a facility emits > 100 pounds/day of ammonia.)

In fact, according to ADEQ's own estimations:

Tonopah would be emitting 1,909.873 lbs/day of ammonia.

Arlington would emit 2311.646 lbs/day + 1341.585 lbs/day for a total of 3,653.231 lbs/day of ammonia.

So when is there going to be an emergency response?

I look forward to your response.

Stephen M. Brittle

DWAZ